

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

KIAMESHA GARAY BORRERO

DEBTOR

CASE NO 20-03516 MCF

CHAPTER 13

**DEBTOR'S MOTION SUBMITTING DOCUMENTS  
RE: MOTOR VEHICLE VALUATION**

**TO THE HONORABLE COURT:**

**NOW COMES, KIAMESHA GARAY BORRERO**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Debtor is hereby submitting the following documents:
  - a. Copy of Kelley Blue Book's valuation of the Debtor's 2015 Mitsubishi Outlander motor vehicle; and
  - b. Copy of photographs recently taken of the interior and exterior of the Debtor's motor vehicle, including a photo of its odometer showing the vehicle's approximate actual mileage (41,714).

**WHEREFORE** the Debtor respectfully requests that this Honorable Court allow the documents submitted with this motion and grant all other remedies which are proper and just, in the above captioned case.

**I CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee Jose R. Carrion Morales; the U.S Trustee's Office; and to all Cm/ECF participants; I also certify that I have mailed by United States Postal Service a copy of this motion to the following non CM/ECF participants: the Debtor Kiamesha Garay Borrero, PO Box 138 Caguas PR 00726; William Santiago Sastre, Esq., De Diego Law Offices, PSC, Counsel For Oriental Bank, PO Box 79552 Carolina PR 00984-9552 and via email: [wssbankruptcy@gmail.com](mailto:wssbankruptcy@gmail.com), in the above captioned case.

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Case no. 20-03516 MCF13  
Motion Submitting Documents

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 20<sup>th</sup> day of October, 2020.

/s/ Roberto Figueroa Carrasquillo  
USDC #203614  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
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Used Car Prices

# 2015 Mitsubishi Outlander

ES Sport Utility 4D

Caguas, PR 00725

Edit Options Typical Mileage: 41,714 Edit

See Trade-in Value

27 MPG

Combined Fuel Economy

4.7 ★ Consumer

3.1 ★ KBB.com

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Private Party Range  
**\$8,586 - \$10,471**

Private Party Value  
**\$9,529**



**Important info  
& Definitions**

Based on  
Good Condition

Valid for ZIP Code 00725 through 10/19/2020

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Vehicle to You.**

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